



October 12, 2009

Susan Hudson  
Vermont Public Service Board  
112 State Street, Drawer 20  
Montpelier, VT 05620-2701

Re: Docket 7523

Implementation of Standard Offer Prices for Sustainably Priced Energy Enterprise Development (SPEED)  
Resources

Dear Ms. Hudson:

Delta Energy Group (DEG) offers the following comments with regard to two issues discussed at the October 8<sup>th</sup> workshop.

With respect to issue #9 – Definition of Plant/ groups of facilities

Delta Campus is a 130+ acre mixed use Business Park located in Brattleboro. DEG is charged with developing, facilitating, and overseeing renewable energy and energy efficiency projects in the park. In 2004, DEG designed and commissioned a Trigenation facility that feeds the anchor tenant on the campus – Omega Optical. This Trigen system has supplied Omega with onsite electricity, along with process and space heat and cooling via waste a heat recovery system. The generator sets that power the Trigen system have successfully operated on B-20, B-40, and now a “V5” which is made up of 5% highly refined waste vegetable oil.

DEG is ready to install a second generation Trigen plant, with state of the art generator set technology that will be fueled entirely with V99.9. The new Trigen system will produce renewable electricity for the FIT program, while also generating and providing heat and cooling from the waste heat recovery system.

In addition, DEG intends to produce renewable electricity for the FIT program on a different part of the campus, via a wholly unique Solar Electric System.

DEG seeks clarification as to the language and intent of the statute and requests that the board consider take into account the above two systems that are separate in their scope, technology, and interconnection.

With respect to issue #4 – Definition of “Other Products”

As described above, DEG intends to install a second generation Trigen plant. A highly critical component that is necessary for economic and system viability is the need to capture waste heat and reuse it to create hot water. It is for this reason that DEG supports a ruling that “Other Products” NOT include heat in the standard offer contract, since it is central to the success of any Cogen or Trigen system.

Thank you for the opportunity to submit these comments.

Best Regards,

A handwritten signature in black ink, appearing to read "D. McManus".

David McManus  
General Manager, Delta Energy Group